

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION INJURY  
LITIGATION**

**MDL No. 2492**

**Master Docket No. 1:13-cv-09116**

**This Documents Relates To:  
All Cases**

**Judge John Z. Lee**

**Magistrate Judge Geraldine Soat Brown**

**AGREED MOTION FOR EXTENSION OF TIME**

Plaintiff Anthony Nichols (“Nichols”), by and through his counsel, respectfully moves the Court for a 21-day extension of time (until July 15, 2015) to file his objection to the Lead Plaintiffs’ pending motion for preliminary approval of class settlement. (Dkt. 154.) In support of this motion, Nichols states as follows:

1. On May 14, 2015, the Court directed Nichols to file a memorandum regarding the viability of a Rule 23(b)(3) personal injury damages class by June 24, 2015. (Dkt. 182).
2. Since that time, Nichols’ counsel have been working diligently to prepare the memorandum, including by reviewing the relevant discovery and engaging potential experts. However, given the complexity of the issues and the size of the record, Nichols respectfully requests a 21-day extension (until July 15, 2015) of the deadline to file his memorandum with the Court.
3. Nichols believes that the additional time is necessary to present the Court with the best possible record from which to evaluate the fairness of the proposed class settlement.
4. Nichols’ counsel conferred with Interim Class Counsel and counsel for NCAA on

June 19, 2015. Neither Interim Class Counsel nor counsel for NCAA opposes this motion, and all agree to the requested extension.

5. Accordingly, Nichols respectfully submits that good cause exists for the requested extension and that this motion is not brought for the purposes of delay.

WHEREFORE, Anthony Nichols respectfully requests a 21-day extension of time until July 15, 2015 to submit his memorandum regarding the viability of a personal injury damages class under Rule 23(b)(3), and for such further relief as this Court deems equitable and just.

Respectfully submitted,

**ANTHONY NICHOLS**

By: /s/ Ari J. Scharg  
One of his Attorneys

Jay Edelson  
jedelson@edelson.com  
Rafey S. Balabanian  
rbalabanian@edelson.com  
Ari J. Scharg  
ascharg@edelson.com  
EDELSON PC  
350 N. LaSalle, Suite 1300  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378

**CERTIFICATE OF SERVICE**

I, Ari J. Scharg, an attorney, hereby certify that on June 19, 2015, I served the above and foregoing ***Agreed Motion for Extension of Time***, by causing true and accurate copies of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system.

/s/ Ari J. Scharg